

EXHIBIT 96

Plaintiffs and Northwestern stipulate and agree as follows:

1. For each Academic Year from 2003 through 2022, Northwestern in some instances admitted students based on factors which included the applicant's family's donation history and/or capacity for future donations ("donor-related admissions").
2. Northwestern will not for any purpose invoke or claim immunity under the Section 568 exemption during this litigation.
3. Plaintiffs agree that, as to Northwestern, this stipulation and agreement resolves Plaintiffs' Motion to Compel Defendants to Provide FERPA Notices Pursuant to this Court's Order Regarding FERPA and the Production of Certain Documents and Information (Dkt. No. 443-1) and Plaintiffs' Motion to Compel Production of Certain Donor Reports and to Compel Northwestern to Produce President Morton Schapiro for Two Additional Hours of Deposition, and that Plaintiffs will not take any further discovery of Northwestern as to donor-related admissions, including but not limited to the relief requested in those Motions.
4. Plaintiffs may use or introduce all discovery already obtained from Northwestern for any purposes Plaintiffs choose, consistent with the Confidentiality Order in this case, including but not limited to introduction into evidence, and with witnesses, at trial. Likewise, nothing in this stipulation and agreement restricts Northwestern from using any discovery it has provided for any purposes, consistent with this stipulation and the Confidentiality Order.

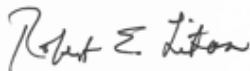
The stipulations and agreements set forth above do not foreclose Northwestern from responding to any allegations or arguments that Plaintiffs make about Northwestern's donor-related admissions that go beyond the stipulations and agreements set forth above.



Scott Stein (for Northwestern)

10-13-2023

Date



Robert Litan (for Plaintiffs)

10-13-2023